

EXHIBIT K

Howard S. Finkelstein, P.C. (NY)
Andrew G. Finkelstein, P.C. (NY & NJ)
George M. Levy (NY)
Kenneth L. Oliver, P.C. (NY)
Joel S. Finkelstein, P.C. (NY, NJ, MA & FL)
Duncan W. Clark (NY)
Ronald Rosenkranz (NY)
Robert J. Camera (NY & NJ)
Joseph P. Rones (NY & NJ)
Steven Lim (NY)
George A. Kohl, II (NY & MA)
Eleanor L. Polimeni (NY)*
Steven H. Cohen (NY)
Francis Navarra (NY)
Andrew J. Genna, LLM (NY & PA)
Thomas C. Yatto (NY)
Elyssa M. Fried-DeRosa (NY)
Mary Ellen Wright, R.N. (NY)
Kenneth B. Fromson (NY, NJ & PA)
Nancy Y. Morgan (NY, NJ & PA)
Andrew L. Spitz (NY)

Finkelstein & Partners
THE INJURY ATTORNEYS

James W. Shuttleworth, III (NY)
Lawrence D. Lissauer (NY)
David E. Gross (NY & NJ)
Julio E. Urrula (NY)
Victoria Lieb Lightcap (NY & MA)
Ann R. Johnson (NY & CT)

Debra J. Reisenman (NY)
Michael T. McGarry (NY)
Steven P. Shuliz (NY & MA)
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Marie M. DuSault (NY)
Glenn W. Kelleher (NY)
Melody A. Gregory (NY & CT)
Gail Schlanger (NY)
Elizabeth A. Wolff (NY & MA)
Keith L. Allman (CA)

Of Counsel

Michael Feldman (NY & NJ)
Michael Finkelstein (NY)
Cynthia M. Maurer (NY & NJ)
Raye D. Fularfas (NJ)
Kenneth Cohen (NJ)
Linda Armati-Epstein (NY)
John F. Dowd (NY & CT)
David Akerib (NY)
Mark B. Hudoba (NY)
Kenneth G. Barlett (CT & NJ)

Gustavo W. Alzugaray (NY & NJ)
Frances M. Bova, R.N. (NY & NJ)
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Ari Kresch (NY & MI)
Jeffrey A. Brown, MD, MPH (NY & NJ)
Dennis G. Ellis (NY)
Gail Koff, P.C. (NY)
Joel Bossom (NY)
Eric L. Horn (NY, CT & MA)
Michael O. Gitelson (NY)
Scott N. Baldassano (NY & NJ)
Antonio S. Grillo (NY)
Michael Flomenhaft (NY)*
Benedene Cannala (NY)*
Stephanie O'Connor, R.N. (NY)*
Ashok Nihalani (NY)*
Shareef Rabaa (OH)*
* The NeuroLaw Trial Group

REFER TO OUR FILE #: 200599

October 30, 2009

Mr. Mark S. Cheffo
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, N.Y. 10036

In re: Neurontin Marketing, Sales Practices
and Products Liability Litigation
MDL-1629

Shearer vs. Pfizer, et al.
07-CV-11428 - PBS

Dear Mr. Cheffo:

Enclosed please find Plaintiff's Further Supplemental Disclosure Statement in the above-referenced matter.

Very truly yours,

FINKELSTEIN & PARTNERS, LLP
/s/ Eleanor L. Polimeni
ELEANOR L. POLIMENI, ESQ.

Encl.

Newburgh • Albany • Binghamton • Kingston • Middletown • New Windsor • Newark • Port Jervis • Poughkeepsie • Spring Valley • Syracuse • Troy

X 1279 ROUTE 300, P.O. BOX 1111
NEWBURGH, NY 12551

Phone: (845) 562-0203 Fax: (845) 562-3492 www.lawampm.com

101 WHITNEY AVENUE
NEW HAVEN, CT 06510



UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY LITIGATION : MDL Docket No. 1629
: Master File No. 04-10981
X : Judge Patti B. Saris
: Magistrate Judge Leo T.
: Sorokin
THIS DOCUMENT RELATES TO: :
LINDA B. SHEARER, as Administratrix of the Estate of :
HARTLEY PARKER SHEARER a/k/a HARTLEY SHEARER, :
deceased :
07 CA 11428 PBS :
X

PLAINTIFF'S FURTHER SUPPLEMENTAL DISCLOSURE STATEMENT

PLEASE TAKE NOTICE, that, pursuant to Rule 26 of the Federal Rules of Civil Procedure, Plaintiff, by her attorneys, further supplements her Rule 26 disclosures as follows. This further supplemental disclosure is in addition to Rule 26 disclosures previously made which are incorporated herein by reference.

These disclosures are made subject to all objections as to competence, materiality, relevance, or other objections as to admissibility that may apply in the event that any such response, or the information contained in it, is sought to be used in court. Plaintiff(s) expressly reserve all such objections.

A. Rule 26(a)(1)(A): The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

Discovery and investigation in this action is ongoing. Based on the information reasonably available, Plaintiff is unable at the present time to identify each and every individual who would have discoverable information that Plaintiff may use to support their claims or defenses in this case, and the subjects of such information. Plaintiff reserves the right to supplement these disclosures as they become aware of additional individuals who have such information.

Subject to the foregoing and without waiver of any of Plaintiff's rights, the following individuals may have information that Plaintiff may use to support their claims or defenses in this action:

1. Paula Consolini, 195 Pine Cobble Rd, Williamstown, MA 01267, telephone number 413-458-2814;
2. Jim Mahon, 195 Pine Cobble Rd, Williamstown, MA 01267, telephone number 413-458-2814;
3. Vito Acconci, 20 Jay St, Brooklyn, NY 11201, telephone number 718-852-6591;
4. David Madigan, PhD, Professor of Statistics, Columbia University;
5. Javier Cabrera, PhD, Professor of Statistics, Rutgers University;
6. Sharon-Lise T. Normand, PhD, Professor of Biostatistics, Harvard School of Public Health;
7. Any witnesses noticed for deposition by defendants.

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Plaintiff reserves the right to amend or supplement without prejudice any and all disclosures herein consistent with these

developments, including identifying additional areas of information, relevant documents, and tangible things that support their claims or defenses in this case.

Dated: October 30, 2009


Eleanor L. Polimeni
Eleanor L. Polimeni
Finkelstein & PARTNERS, LLP
1279 Route 300, PO Box 1111
Newburgh, NY 12551
(845) 562-0203

TO: Mark Cheffo, Esq.
Skadden, Arps, Slate, Meagher & Flom, LLP
Four Times Square
New York, NY 10036

CERTIFICATE OF SERVICE

I, Eleanor L. Polimeni, an attorney at law of the State of New York admitted to practice in the State and Federal Courts of the State of New York, hereby certifies under penalty of perjury, that on October 30, 2009, I caused a copy of Plaintiff's Further Supplemental Disclosure Statement to be served by depositing same in a depository of the United States Postal Service via first class delivery upon:

Mark Cheffo, Esq.
Skadden, Arps, Slate, Meagher & Flom, LLP
Four Times Square
New York, NY 10036


ELEANOR L. POLIMENI, ESQ.